



Evenflo Company, Inc.
707 Crossroads Court
Vandalia, Ohio 45377
(937) 415-3300

239928

RANDY KISER
Director, Safety, Research & Development
(937) 415-3372
randy.kiser@evenflo.com

February 18, 2003

Dr. Jeffrey W. Runge
Administrator
National Highway Traffic Safety Administration
400 Seventh Street SW
Washington, DC 20590

NHTSA-03-14345-4

**RE: Petition for Rulemaking – Child Restraints Used
for Air Bag Suppression System Testing**

Dear Dr. Runge:

In accordance with 49 CFR 552, I am submitting this Petition for Rulemaking on behalf of Evenflo Company, Inc. ("Evenflo") of Vandalia, Ohio. This petition addresses the requirement in 49 CFR Part 571.208 "Occupant Crash Protection" ("FMVSS 208") that certain specific models of child restraints be used to test the suppression systems of vehicles certified as being in compliance with 49 CFR Part 571.208 S19. Specifically, this petition requests that certain Evenflo models listed be exchanged for newer models as they were discontinued effective August 30, 2002.

Appendix A to FMVSS 208 requires that certain child restraint systems manufactured by Evenflo be used "to test the suppression system of a vehicle that has been certified as being in compliance with 49 CFR Part 571.208 S19:"

204 First Choice
212 Discovery Adjust Right
254 Medallion
245 RightFit
282 On My Way Position Right V
425 Horizon V

Of these child restraints, only the Discovery and RightFit were kept in production after August 30, 2002. Further, the Discovery is equipped with a lower anchor system ("LATCH") and a new model number has been assigned.

Evenflo suggests the following child restraints be used for rear-facing tests in lieu of previously available Evenflo models:

381 Tot Taxi
386 Port About 5

The model 381 Tot Taxi is similar to the model 204 First Choice in that it is only available as a stand-alone infant restraint; i.e., no removable base is provided. The model

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386 Port About 5 is roughly equivalent in size to the model 282 On My Way Position Right V.

Evenflo also requests that the model number for the Discovery be changed from 212 Discovery Adjust Right to 316 Discovery. The new model number indicates that it is equipped with LATCH hardware. Note too that the product name is now simply "Discovery."

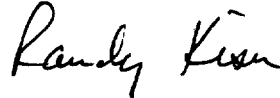
Evenflo suggests that the following child restraints be used for forward-facing convertible restraint testing in lieu of previously available Evenflo models:

359 Triumph
379 Tribute 5

The model 359 Triumph is roughly equivalent in size to and has a 5-point restraint harness like the model 254 Medallion. The model 379 Tribute 5 is equivalent in size to the model 425 Horizon V.

Thank you for your time and consideration of our petition. If there is additional information that Evenflo can provide please do not hesitate to contact me at 937-415-3372.

Sincerely,



Randy Kiser

EXECUTIVE SECRETARIAT
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